

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

FRANCIS X. MOORE,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 04-10922-DPW
)	
INTERNAL REVENUE SERVICE (UNITED)	
STATES GOVERNMENT),)	
)	
Defendant.)	

UNITED STATES' RULE 26(a)(1) DISCLOSURES

The defendant and counterclaim plaintiff, United States of America, by its undersigned counsel, hereby makes the following Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

A. Identity of Individuals Likely to Have Discoverable Information

Plaintiff believes that the following individuals may possess discoverable information with regard to any disputed facts, as alleged in the Complaint and Counterclaim:

1. Francis X. Moore - 56 Story Street, South Boston, MA 02127
2. Joe Cannata - 21 ½ Mt. Vernon St., Dorchester, MA 02125
3. Arthur Capuzzo - 27 Ward St., South Boston, MA 02127
4. John Foley - 46 Roseen Rd., Holbrook, MA 02343
5. Robert Gooch - 295 West 3rd St., South Boston, MA 02127
6. John Morrill - 181 W. 9th St., South Boston, MA 02127
7. Edward Satchell - 546 Willard St., Quincy, MA 02169

8. Members of the Board of Directors of the American Legion Post,
#368

B. Identity of Documents Relevant to Disputed Facts

Counsel for the United States has a copy of the administrative file compiled by the Internal Revenue Service with respect to this 26 U.S.C. § 6672 assessment made against Mr. Moore for the last quarter of 1993, all four quarters of 1994, and all four quarters of 1995. This file has been copied and will be turned over to the plaintiff and counterclaim defendant upon a final review to determine whether assertions of privilege are necessary.

C. Computation of Damages Claimed by Counterclaim Plaintiff

Counterclaim Plaintiff claims \$19,387.45, as of August 15, 2004, plus interest accruing thereafter.

D. Disclosure of Applicable Insurance Agreement

This section is inapplicable in the case at bar.

/s/ Lydia Bottome Turanchik
LYDIA BOTTOME TURANCHIK
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I hereby certify that a true copy of the above document was served upon each party appearing pro se by mail on September 28, 2004.

/s/ Lydia Bottome Turanchik
Lydia Bottome Turanchik